

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

iRACING.COM MOTORSPORT SIMULATIONS LLC,	)	
a Delaware Limited Liability Company, Plaintiff	)	
	)	
V.	)	Civil Action No.
	)	05-11639 NG
TIM ROBINSON, individually and d/b/a	)	
<a href="http://www.ow-racing.com">www.ow-racing.com</a> and <a href="http://www.torn8oalley.com">www.torn8oalley.com</a> ,	)	
and <a href="http://www.first-racing-sucks.com">www.first-racing-sucks.com</a>	)	
	)	
Defendant	)	
-----		

DEFENDANT'S RESPONSE TO  
PLAINTIFF'S MOTION TO COMPEL

Introduction

At the hearing on Defendant's Motion to Dismiss and Plaintiff's Motion to Compel, iRacing's counsel introduced a picture of Robinson's computer home page. According to iRacing, the picture was posted by Robinson on July 10, 2005. There is no confirmation as to when the picture was made.

Attached hereto as Attachment "A" is a listing received from Robinson identifying to the best of his knowledge all of the icons that appear in this picture.

By his attorneys,

Joseph F. Ryan BBO# 435720  
Lyne Woodworth & Evarts LLP  
600 Atlantic Avenue  
Boston, MA 02210  
Telephone 617/523-6655 - Telecopy 617/248-9877  
E-mail: [Jryan@LWELaw.com](mailto:Jryan@LWELaw.com)

## ATTACHMENT "A"

Below is the list of icons that Schwartz and Company think hide some secret data.

I have attempted to describe what each is to the best of my knowledge based on looking at the image they provided.

Most of these icons/files no longer exist, so there is a small amount of guessing on a couple, which I have **bolded** for identification on those.

- 1 – 7z310 – Compression/Decompression software
- 2 – DatZ – NR2003 Utility widely distributed
- 3 – makedatx – NR2003 Utility widely distributed
- 4 – Champ Cars – folder of paint schemes**
- 5 – DF\_9.0.4.0 – CMS (Content Management Software) package
- 6 – OWSC-070805 – OWSC for rFactor Project Folder
- 7 – OWR-read – OWR Readme file
- 8 – 48QStateJ – GTP Paint scheme WINMIP
- 9 – DateCracker – date utility
- 10 – vegas40\_m – video editing software
- 11 – 48QStateJ – GTP Paint scheme PSP
- 12 – making\_upl – php script for uploading files**
- 13 – papy\_ai – NR2003 file for adjusting AI characteristics
- 14 – OWSC – icon for OWSC Mod
- 15 – owr\_setup – can't find the icon???**
- 16 – thepits\_gtp - EZ install file for the GTP mod by The US Pits
- 17 – C48\_Qstate – Pit Crew export from WINMIP
- 18 – OWR\_Server – OWR Server file
- 19 – owr\_easter – html file
- 20 – track\_OW – OW Track .ini file
- 21 – track – track .ini file
- 22 – owsc\_v1 – html web file
- 23 – extension – CMS file
- 24 – Instructions on how t.. – Word doc for Torn8oAlley.com Admins to upload league standings and exports
- 25 – Hex Workshop 4.2 – demo software icon
- 26 – 24\_aero\_mt – NR2003 paint scheme
- 27 – owr2k5\_v1 – self installing .exe for owr
- 28 – kill\_nr2003 – nr2003 utility for enduro events
- 29 – MakeDat – NR2003 utility widely distributed
- 30 - owr05\_Mal – rFactor development folder
- 31 – owr2k5\_v1 – zip file of self installing .exe above
- 32 – owsc\_psp\_t – OWSC PSP Templates
- 33 – Sprint\_Cars – no idea what this file is**
- 34 – 1\_PennzoilJ – GTP paint scheme
- 35 – owsc\_v1\_hm – web page

- 36 – NR2003 OWSC Icon
- 37 – 24\_aero\_mt – PSP paint scheme
- 38 – owr\_tman – video of a hot lap
- 39 – 30\_goodwr – PSP paint scheme
- 40 – owr\_easter – html backup file
- 41 – OWOR Text.txt – text backup file for OWR read me
- 42 – at\_ta\_bridg – NR2003 setup file
- 43 – OWR Beta Cars – folder of paint schemes
- 44 – OWR\_ReadMe – readme file for OWR
- 45 – 24\_aero\_mt – WINMIP paint scheme
- 46 – new\_owr\_t.. – folder of new OWR templates
- 47 – rF SRA 15Jun05 – rFactor Development folder
- 48 – 37\_pennzo – PSP paint scheme
- 49 – OWR\_Read – bak file
- 50 – Tools15Jun05 – rFactor tools
- 51 – DF\_9.0.3.0 – CMS Software package.